

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

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Applicant	:	Kelvin Chong et al.	
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Customer No.	:	29,906	

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**APPEAL BRIEF PURSUANT TO 37 C.F.R. § 41.37**

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## I. Summary of Claimed Subject Matter

Embodiments of the present invention relate generally systems and methods for visually building multi-channel applications.

Independent claim 1 relates to a computer-readable medium having computer-executable modules. The computer-readable medium includes a first computer-executable module ((12) in FIG. 7; (654) in FIG. 27), a second computer-executable module ((16) in FIG. 7; (658) in FIG. 27) and a third computer-executable module ((14) in FIG. 7; (656) in FIG. 27). The first computer-executable module ((12) in FIG. 7; (654) in FIG. 27) is adapted to allow a developer to visually design workflow ((400) in FIG. 17; see also FIG. 19. FIG. 35, FIG. 58, FIGS. 80-97, FIG. 110, FIG. 111)) describing a multi-channel application capable of operating over a plurality of channels. The workflow includes a plurality of layers ((460) in FIG. 19; see also FIGS. 55 and 95-97), where each of the layers ((460) in FIG. 19; see also FIGS. 55 and 95-97) corresponds to at least one channel of the multi-channel application. The workflow includes a plurality of states ((434), (435) in FIG. 19; see also (700) in FIG. 28; (812), (826) in FIG. 29; FIGS. 33-35; FIGS. 80-94) and a plurality of transitions ((818) in FIG. 29; (444) in FIG. 19; FIGS. 17, 33,-35, 58, 83-97, 110). Each layer ((460) in FIG. 19; see also FIGS. 55 and 95-97) includes states ((434), (435) in FIG. 19; see also (700) in FIG. 28; (812), (826) in FIG. 29; FIGS. 33-35; FIGS. 80-94) and transitions ((818) in FIG. 29; (444) in FIG. 19; FIGS. 17, 33,-35, 58, 83-97, 110) common to at least one channel of the multi-channel application. The second computer-executable module ((16) in FIG. 7; (658) in FIG. 27) allows a developer to design views (see FIG. 17, FIG. 40 and FIG. 108) for the multi-channel application, and the third computer-executable module ((14) in FIG. 7; (656) in FIG. 27) allows the developer to integrate data sources within the multi-channel application. (See FIGS. 17, 19, 27, 28, 55 and Abstract; page 16, line 18- through page 17, line 2; page 32, lines 3-9; page 35, lines 1-3; page 36, line 22 through page 37, line 15; page 38, lines 10-22; and page 74, line 19 through page 75, line 7).

Independent claim 7 relates to a computer system for visually building multi-channel applications. The computer system includes a graphical user interface (GUI) 400. The GUI 400 includes a user interface selection device and a display for displaying an interactive development environment (500) for visually designing workflow ((400) in FIG. 17; see also FIG. 19. FIG. 35, FIG. 58, FIGS. 80-97, FIG. 110, FIG. 111)) describing a multi-channel application capable of

operating over a plurality of channels. The interactive development environment (500) allows a developer to independently design the workflow in a plurality of layers ((460) in FIG. 19; see also FIGS. 55 and 95-97), where each layer ((460) in FIG. 19; see also FIGS. 55 and 95-97) includes states ((434), (435) in FIG. 19; see also (700) in FIG. 28; (812), (826) in FIG. 29; FIGS. 33-35; FIGS. 80-94) and transitions ((818) in FIG. 29; (444) in FIG. 19; FIGS. 17, 33,-35, 58, 83-97, 110) common to at least one channel of the multi-channel application. (See FIGS. 17, 19, 27, 28, 55 and Abstract; page 16, line 18- through page 17, line 2; page 32, lines 3-9; page 35, lines 1-3; page 36, line 22 through page 37, line 15; page 38, lines 10-22; and page 74, line 19 through page 75, line 7).

Independent claim 13 relates to a computer system for visually building a multi-channel application capable of operating over a plurality of channels. The computer system includes a graphical user interface (400) adapted to allow a user to visually build a single workflow ((400) in FIG. 17; see also FIG. 19. FIG. 35, FIG. 58, FIGS. 80-97, FIG. 110, FIG. 111)) describing a multi-channel application capable of operating over a plurality of channels, and a module for converting the visually built workflow into a markup language. The single workflow comprises a plurality of layers ((460) in FIG. 19; see also FIGS. 55 and 95-97), where each of the layers ((460) in FIG. 19; see also FIGS. 95-97) corresponds to at least one channel of the multi-channel application. The single workflow includes a plurality of states and a plurality of transitions, where each layer includes states ((434), (435) in FIG. 19; see also (700) in FIG. 28; (812), (826) in FIG. 29; FIGS. 33-35; FIGS. 80-94) and transitions ((818) in FIG. 29; (444) in FIG. 19; FIGS. 17, 33,-35, 58, 83-97, 110) common to at least one channel of the multi-channel application. (See FIGS. 17, 19, 27, 28, 55 and Abstract; page 16, line 18- through page 17, line 2; page 32, lines 3-9; page 35, lines 1-3; page 36, line 22 through page 37, line 15; page 38, lines 10-22; and page 74, line 19 through page 75, line 7).

Independent claim 19 relates to a method of building a multi-channel application ((400) in FIG. 17; see also FIG. 19. FIG. 35, FIG. 58, FIGS. 80-97, FIG. 110, FIG. 111)). According to this method, an application workflow is designed within a visual development environment ((400) in FIG. 17; see also FIG. 19. FIG. 35, FIG. 58, FIGS. 80-97, FIG. 110, FIG. 111)) in a plurality of layers ((460) in FIG. 19; see also FIGS. 55 and 95-97). The application workflow describes a multi-channel application capable of operating over a plurality of channels. The application workflow comprises a plurality of states ((434), (435) in FIG. 19; see also (700) in

FIG. 28; (812), (826) in FIG. 29; FIGS. 33-35; FIGS. 80-94) and a plurality of transitions. The application workflow also includes a plurality of layers ((460) in FIG. 19; see also FIGS. 55 and 95-97), wherein each layer ((460) in FIG. 19; see also FIGS. 55 and 95-97) includes states ((434), (435) in FIG. 19; see also (700) in FIG. 28; (812), (826) in FIG. 29; FIGS. 33-35; FIGS. 80-94) and transitions ((818) in FIG. 29; (444) in FIG. 19; FIGS. 17, 33-35, 58, 83-97, 110) common to at least one channel of the multi-channel application. After linking the states ((434), (435) in FIG. 19; see also (700) in FIG. 28; (812), (826) in FIG. 29; FIGS. 33-35; FIGS. 80-94), the application workflow is converted into an application descriptor for delivering the application over at least one of the plurality of channels. (See FIGS. 17, 19, 27, 28, 55 and Abstract; page 16, line 18- through page 17, line 2; page 32, lines 3-9; page 35, lines 1-3; page 36, line 22 through page 37, line 15; page 38, lines 10-22; and page 74, line 19 through page 75, line 7).

In response to the second notification of non-compliant appeal brief, Appellants submit a revised Summary of Claimed Subject Matter with reference to the specification page and line number and to the drawings by reference characters.

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Respectfully submitted,  
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10 Dated January 23, 2008

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